

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

|   |   |                                    |
|---|---|------------------------------------|
| JUDY HALCOM, HUGH PENSON,<br>HAROLD CHERRY, and RICHARD<br>LANDINO, Individually and on Behalf of All<br>Others Similarly Situated, | ) | Civil Action No. 3:21-cv-00019-REP |
|   | ) |                                    |
|   | ) | <u>CLASS ACTION</u>                |
|   | ) |                                    |
| Plaintiffs,   | ) |                                    |
|   | ) |                                    |
| vs.   | ) |                                    |
|   | ) |                                    |
| GENWORTH LIFE INSURANCE<br>COMPANY and GENWORTH LIFE<br>INSURANCE COMPANY OF NEW YORK,  | ) |                                    |
|   | ) |                                    |
| Defendants.   | ) |                                    |

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CLASS COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND  
EXPENSES AND SERVICE AWARDS TO THE NAMED PLAINTIFFS

Plaintiffs Judy Halcom, Harold Cherry, Hugh Penson, and Richard Landino (“Plaintiffs” and collectively “Named Plaintiffs”) respectfully move the Court for entry of an Order: (i) awarding attorneys’ fees in the amount of \$1,000,000.00 relating to the injunctive relief achieved for the Settlement Class, and an additional contingent payment equal to 15% of the cash damages payments made pursuant to the Special Election Options selected by the Settlement Class, in an amount not to exceed \$18,500,000.00, as well as payment of litigation expenses of \$26,701.96, to be paid in accordance with the terms of the Settlement Agreement; and (ii) awarding service awards of \$15,000.00 to each of the Named Plaintiffs in connection with their representation of the Class. The grounds and reasons for granting this relief are stated with particularity in the accompanying brief and other supporting papers.

Pursuant to this Court’s Order Granting Preliminary Approval of Settlement and Directing Notice to the Class, a hearing is set for February 9, 2022, at 10:00 a.m. to address this motion.

(ECF Nos. 51 and 52). Proposed orders will be submitted with Plaintiffs' reply submission on or before January 27, 2022.

DATED: December 3, 2021

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/s/ Jonathan M. Petty

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Attorneys for Plaintiffs and Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2021, I filed the foregoing pleading or paper through the Court's CM/ECF system, which sent a notice of electronic filing to all registered users.

/s/ Jonathan M. Petty

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